

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEBRASKA

RYSTA LEONA SUSMAN, both )  
individually and as Legal Guardian of )  
SHANE ALLEN LOVELAND, et al., )  
 )  
Plaintiffs, )  
 )  
vs. ) Case No. 8:18-cv-00127  
 )  
THE GOODYEAR TIRE & RUBBER )  
COMPANY, )  
 )  
Defendant. )

**IDENTIFICATION OF NON-EXPERT AND EXPERT WITNESSES**

The Goodyear Tire & Rubber Company (“Goodyear”) pursuant to the Initial Progression Order (Doc. No. 56) identifies the following non-experts who may have relevant knowledge and expert witnesses who are expected to testify for Goodyear at trial:

**I. Non-Expert Witnesses**

Goodyear adopts and incorporates by reference the non-expert witness disclosure of Plaintiffs (Doc No. 75). In addition, Goodyear discloses the following:

A. Good Samaritan Hospital  
10 E. 31<sup>st</sup> Street  
Kearney, NE 68847

Physicians and healthcare providers for Larry Blair and Jacob Summers.

B. Independent Forensic Investigations Corp.  
3051 99<sup>th</sup> Street  
P.O. Box 7839  
Urbandale, IA 50323

Inspected vehicle and tires.

**II. Expert Witnesses**

**A. Tire Failure Analysis**

1. Product Analysis  
The Goodyear Tire & Rubber Company  
200 Innovation Way  
Akron, OH 44316

Goodyear expects to call a member of Goodyear's Product Analysis team to testify to its inspection, the findings on inspection, and conclusions as to the cause of the tire disablement.

2. Joseph L. Grant  
4201 Moss Creek Court  
Matthews, North Carolina 28105

Mr. Grant is expected to testify to his inspection, the findings on inspection, and conclusions regarding disablement of the tire at issue.

**B. Accident Reconstruction/Vehicle Controllability**

1. Stephen J. Fenton, P.E.  
Kineticorp  
6070 Greenwood Plaza Boulevard, Suite 200  
Greenwood Village, Colorado 80111
2. Gray Beauchamp, M.S., P.E.  
Kineticorp  
6070 Greenwood Plaza Boulevard, Suite 200  
Greenwood Village, Colorado 80111

**C. Biomechanical Engineer**

Goodyear expects to call a biomechanical engineer to testify to the plaintiffs' injuries and causation. Goodyear has not yet made a choice on whom it will use for this testimony, and will supplement when that person is identified.

**D. Physical Medicine and Rehabilitation**

Goodyear reserves the right to identify an expert in the field of physical medicine and rehabilitation to testify to the nature, extent, and prognosis of plaintiffs' injuries. Goodyear has not yet made a choice on whom it will use for this testimony, and will supplement when that person is identified.

**E. Toxicology**

Goodyear reserves the right to identify an expert in toxicology to testify to the role of the use of alcohol or drugs played in the cause of the accident and injuries to the plaintiffs. Goodyear has not yet made a choice on whom it will use for this testimony, and will supplement when that person is identified.

**F. Life Care Planning and Economist**

Goodyear reserves the right to identify expert(s) in the disciplines of life care planning or economics to testify to the future caretaking expense and economic loss to plaintiffs. Goodyear has not yet made a choice on whom it will use for this testimony, and will supplement when that person is identified.

**G. Human Factors**

Goodyear reserves the right to identify an expert in the field of human factors engineering. Goodyear has not yet made a choice on whom it will use for this testimony, and will supplement when that person is identified.

Dated: October 10, 2018

Respectfully submitted,

GREENSFELDER, HEMKER & GALE, P.C.

By: /s/ Edward S. Bott, Jr.

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*Attorneys for The Goodyear Tire & Rubber Company*

#### **CERTIFICATE OF SERVICE**

I hereby certify that I have on this 10th day of October, 2018, electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel of record.

/s/ Edward S. Bott, Jr.

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